

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

20-mj-1010

BRANDON KIDDER,

Defendant.

GOVERNMENT'S MOTION TO SEAL THE COMPLAINT

THE UNITED STATES OF AMERICA, by and through its attorney, James P. Kennedy, Jr., United States Attorney for the Western District of New York, and the undersigned Assistant United States Attorney, respectfully moves this Court to seal the complaint and file a redacted criminal complaint in this matter as it contains information that could reveal highly-sensitive law enforcement methods.

DISCUSSION

On March 5, 2020, a criminal complaint was executed charging the defendant in the above-captioned matter. *See* Docket No. 1. The criminal complaint outlined the law enforcement methodology used to unearth defendant's criminal conduct. Mistakenly, the government included information about specific law enforcement methodology and separately, file names that offenders can then use as search terms to find images depicting particular victims. Pursuant to Criminal Procedure 49.1(d) and (f), the government hereby moves this Court to redact the criminal complaint as proposed in **Exhibit A**.

CONCLUSION

For the foregoing reasons, the government moves this Court to seal the originally docketed complaint and to allow the government to file a redacted criminal complaint in this matter.

DATED: Buffalo, New York, March 16, 2020.

Respectfully submitted,

JAMES P. KENNEDY, JR.
United States Attorney

S/ CAITLIN M. HIGGINS

BY:

CAITLIN M. HIGGINS
Assistant U.S. Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
(716) 843-5818
Caitlin.higgins@usdoj.gov